



**Rocky Mountain
Remediation Services, L.L.C.**
protecting the environment

Rocky Flats Environmental Technology Site
P.O. Box 464
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Phone (303) 966-7000

CORRES. CONTROL	
LTR. NO	
K-H Corres. #	
99-RF-	
Originator Ltr Log #	
TAH-012-99	
DIST	LTR ENC
BODEY E.D.	
CARMEAN C.H.	
CRAWFORD A.C.	
FINDLEY M.E.	
FRIZ R.C.	
GUINN L.A.	
HUGHES F.P.	
KASEN J.A.	
KORENKO M.K.	
LAW J.E.	
MILLS S.H.	
OVERLID T.W.	
PATTERSON J.W.	
SUTTON S.R.	
TRICE K.D.	
WHEELER M.	
WOLF K.Z.	X
WOLF H.C.	X
BAKER T.	X
BURKS D.	X
ARNOLD P.	X
LAMBLE L.	X
RMRS RECORDS	X X
TRAFFIC	
PATS/T130G	
CLASSIFICATION	
UCNI	
UNCLASSIFIED	X X
CONFIDENTIAL	
SECRET	
AUTHORIZED CLASSIFIER	
SIGNATURE	
[Signature]	
Date	3/2/99
IN REPLY TO RF CC NO	
ACTION ITEM STATUS	
q PARTIAL/OPEN	
q CLOSED	
LTR APPROVALS	
ORIG & TYPIST INITIALS	
TCB dlu	
RF-46469 (Rev 1/99)	

March 2, 1999

Karan S North, Division Manager
Environmental Systems and Stewardship
Kaiser-Hill Company, L.L.C.
Building T130C

**PHASE I SUMMARY REPORT FOR TANK AND ANCILLARY EQUIPMENT
SYSTEM #8 IN BUILDING 771 - TAH-012-99**

Pursuant to the *RCRA Closure Plan for Interim Status Units* (April 1998) (Closure Plan) and the *Closure Description Document for Tank and Ancillary Equipment System #8* (98-RF-05998), Rocky Mountain Remediation Services is submitted the attached *Summary Report of Phase I RCRA Closure Activities for Tank and Ancillary Equipment System #8 in Building 771*.

The summary report contains a description of major closure activities and a declaration that the tanks in this system meet the requirements of the "RCRA Stable" condition

Please transmit this Summary Report to CDPHE at your earliest convenience. A draft letter to CDPHE is attached for your use

If you have questions, please contact me at 303-966-7652 or Tom Baker at 303-966-4329

Ted A Hopkins

Ted A Hopkins
Environmental Compliance Manager

TCB dlu

Attachments (2)
As Stated

cc w/o attachments
K North



ADMIN RECCRD

IA-B771-A-00028

1/5

Attachment 1
TAH-012-99
Page 1

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99-RF-XXXXX

Mr Joe Scheiffelin, Unit Leader
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

PHASE I SUMMARY REPORT FOR TANK AND ANCILLARY EQUIPMENT SYSTEM #8 IN
BUILDING 771 - KSN-XXX-99

Dear Mr Scheiffelin

Pursuant to the *RCRA Closure Plan for Interim Status Units (April, 1998) (Closure Plan)* and the *Closure Description Document for Tank and Ancillary Equipment System #8 in Building 771 (98-RF-05998)*, Kaiser-Hill Company, L L C is submitting the enclosed *Summary Report of Phase I RCRA Closure Activities for Tank and Ancillary Equipment System #8 in Building 771*

The Summary Report contains a description of major closure activities and a declaration that the tanks in this system meet the requirements of the "RCRA Stable" condition

If you have any questions, please contact Tom Baker of Rocky Mountain Remediation Services at 303-966-4329

Karan S North, Division Manager Date
Environmental Systems and Stewardship
Kaiser-Hill Company, L L C

cc
C Gilbreath - CDPHE
D Grosek - DOE, RFFO
G Scheutz - DOE, RFFO
T C Baker - RMRS
R L Cathel - RMRS
T A Hopkins - RMRS
R M Leitner - Savant Enterprises
N C T Van Tyne - ICF Kaiser

Phase I Summary Report of

RCRA Closure Activities for

Tank and Ancillary Equipment System #8

in Building 771

U.S. Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No. CO7890010526

Confirmed and Approved by:



T C Baker, Environmental Compliance, RMRS

3-2-99

Date

Prepared by:



N C T Van Tyne, Project Manager II, ICF Kaiser

3/2/99

Date

1.0 PURPOSE

This Summary Report for Phase I activities in the RCRA closure of Tank and Ancillary Equipment System #8 is a requirement of Section 1.2 of the Closure Description Document (CDD) for this system (98-RF-05998). The major features of this report include a declaration that the piping described in the document was removed as planned, a description of major closure activities and any deviations from those stated in the document, a copy of any newly-generated drawings and relevant analytical results, and a statement regarding whether the tanks included in this system have met the requirements of the "RCRA Stable" condition.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

All sections of process piping for System #8 indicated in the CDD, Figures 1-3, were removed under IWCP work package number T0099148. In addition, the two pumps indicated in Figure 1 were removed. Removal of piping and pumps was confirmed through pre-job and post-job walkdowns of the system.

Piping removal was accomplished by using a 4-wheel cutter inside a sleeve or T-sleeve to cut the pipe wall until separation was almost achieved. The cutter was then removed, the sleeve was taped, the pipe was manually separated, and the sleeve was closed in a pigtail formation to secure all pipe ends. Two short pipe stubs were left at Termination Points (TPs) over Glovebox 15 in Room 114, one pipe stub was left over Glovebox A-20 in Room 180A, and one pipe stub was left over Glovebox MT-4 in Room 146, instead of blind flanges.

The pipe sections were inspected visually by looking through them from one end during size reduction. No blockages were found in any sections and the pipe interiors appeared to be dry. The sections were characterized as non-hazardous low-level waste and were placed into one waste crate. The tanks, which were left in place, no longer contain hazardous waste, and their materials of construction are not considered to be hazardous upon disposal.

Analytical results for the confirmatory sample confirmed that the hydrogen peroxide in this system had dissociated into water, with a pH of 3.5 to 4.0. In addition, there was no significant radioactive contamination. Approximately 4 liters of liquid were recovered during tap and drain activities, among three bottles. Two bottles were transferred into tank D-544. The one bottle collected outside of the glovebox, containing 2.7 liters, will be discarded into the process drain. No additional liquid was recovered during piping removal activities.

3.0 TANK STATUS WITH RESPECT TO THE "RCRA STABLE" CONDITION

Tanks T-30A and T-30B, which are plastic tanks, are included in the Idle Equipment Inventory with ID numbers 771-0012 and 771-0013, respectively. In their current condition, they meet the requirements for the "RCRA Stable" condition as follows

- 1 Each tank is empty of liquids and mobile sludges, which can be verified by looking into the tank from the top. There was no indication of additional residual material inside either tank.
- 2 All process piping connected to the tanks has been removed, along with the tank lids and all remaining piping. The bung holes near the bottom of each tank were left open.
- 3 No liquid can be reintroduced into either tank, since the bung holes near the bottom of each tank are open.

These tanks will continue to be maintained per the requirements of the Idle Equipment Program. Their current condition will be recorded in the Idle Equipment Inventory as appropriate.

4.0 SUMMARY

The requirements of the CDD for Phase I activities in the RCRA closure of System #8 in Building 771 have been fulfilled as stated in the document. In addition, the tanks in this system meet the requirements of the "RCRA Stable" condition, but will remain in the Idle Equipment Inventory and will follow its inspection requirements.